

**National Governors Association
National Conference of State Legislatures
The Council of State Governments
National Association of Counties
National League of Cities
The U.S. Conference of Mayors
International City/County Management Association**

November 22, 2010

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12 St, SW
Washington, DC 20554

Re: PS Docket No. 06-229

Dear Chairman Genachowski:

Our organizations, representing state and local government officials, urge the Federal Communications Commission (FCC) not to allow the flexible use of the 700 MHz public safety narrowband spectrum for broadband services. Such a change poses too great a risk for interference with critical radio communications that could compromise safety and undercut state and local investments in interoperable systems.

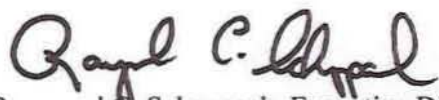
Whether responding to a major disaster like the attacks of September 11th or Hurricane Katrina, or a more localized emergency, state and local first responders need reliable, real-time, interoperable voice communications networks to help save lives and protect property. Several communities, regions and states have begun to meet this need by developing large, multimillion dollar radio communications systems that rely upon 700 MHz public safety narrowband spectrum.

The FCC's proposal to share 700 MHz spectrum between narrowband and broadband services is flawed because the two cannot compatibly coexist using existing technologies. While we believe the potential migration of existing narrowband systems to newer broadband technologies should be explored for possible future consolidation, allowing flexible use of the narrowband spectrum now with no guarantee that the spectrum can support both technologies simultaneously could lead to dangerous interference during life-saving operations.

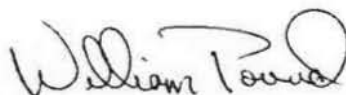
Reliable, interoperable communications during emergencies are too important to put at risk. We urge you not to open the narrowband public safety spectrum to broadband at this time so as not to interfere with first responders' interoperable radio communications.

Thank you for your consideration.

Sincerely,



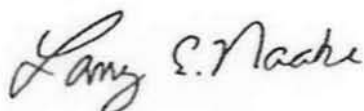
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